

AO 91 (Rev. 11/11) Criminal Complaint

AUSA: Jeanine Brunson  
Special Agent: Justin Henry

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UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America  
v.  
Jessica Ann SIMPSON

FILE  
SEP 10 2019  
CLERK'S OFFICE  
U.S. DISTRICT COURT  
EASTERN MICHIGAN

Case No.

Case: 2:19-mj-30484  
Assigned To : Unassigned  
Assign. Date : 9/10/2019  
Description: RE: JESSICIA ANN  
SIMPSON (EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 3, 2019 in the county of Oakland in the  
Eastern District of Michigan, the defendant(s) violated:

Code Section

Offense Description

18 USC § 922(a)(6)

False/Fictitious statements in order to acquire a firearm

This criminal complaint is based on these facts:  
see attached affidavit.

☒ Continued on the attached sheet.

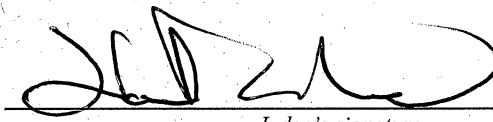
  
Complainant's signature

Justin Henry, Special Agent (ATF)  
Printed name and title

Sworn to before me and signed in my presence.

Date: 9/10/19

City and state: Detroit, Michigan

  
Judge's signature

Hon. David R. Grand, United States Magistrate Judge  
Printed name and title

**AFFIDAVIT**

I, Special Agent Justin Henry, being sworn, depose and state the following;

1. I make this affidavit from personal knowledge based on my participation in this investigation, with exception of the matters expressly stated, which are based on information received from other law enforcement officials and/or their reports and records. The information outlined herein is provided for the limited purpose of establishing probable cause, and does not contain all details or facts that exist pertaining to the investigation.

2. I have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), United States Department of Justice, since May 2014. I am currently assigned to an Oakland County Task Force, Detroit Group III. Prior to being employed as a Special Agent, I was a Police Officer with the Wayne State University Police Department (WSUPD), for over six (6) years. During that time, I was assigned to an ATF Task Force and also assigned with the Wayne County Sheriff's Office Narcotics Enforcement Task Force (WCSONE). I am a graduate of the ATF Special Agent Basic Training Program and of the Oakland County Community College Police Academy. I have also earned a Masters of Arts Degree in Criminal Justice from Wayne State University. During my employment with ATF, I have participated in numerous criminal investigations focused on firearms, armed drug trafficking violations

and criminal street gangs. I have also investigated violations of Title 18, United States Code, Section 922(a)(6), Making False Statements to obtain a Firearm.

3. I, along with other law enforcement personnel, have developed probable cause to believe that Jessica SIMPSON, W/F, DOB: XX/XX/1986, knowingly made false statements to a firearms dealer to obtain a firearm, in violation of Title 18, United States Code, Section 922(a)(6).

4. On July 3, 2019, Jessica SIMPSON purchased a SCCY Model: CPX-2, Serial# 658930, 9mm pistol from Bass Pro Outdoor World, located at 4500 Baldwin, Auburn Hills, Michigan. SIMPSON completed an ATF Form 4473, as required by law, when she purchased the above-mentioned firearm, and Law Enforcement obtained a copy of the form.

5. The form signed by SIMPSON includes a series of questions for the purchaser to answer. The first question asked: "Are you the actual transferee/buyer of the firearm(s) listed on this form." Immediately after that question, the form signed by SIMPSON contained the following warning to the buyer: **"Warning: You are not the actual buyer if you are acquiring the firearm(s) on behalf of another person. If you are not the actual buyer, the dealer cannot transfer the firearm(s) to you."** On this form, the box was checked indicating that SIMPSON was the "actual buyer" of the firearm.

6. On July 19, 2019, just 16 days later, Demarco Kinel was shot and killed in the area of Pennsylvania/ Melrose, Pontiac, Michigan.

7. On or about July 19, 2019, Jevon Hairston was arrested by The Oakland County Sheriff's Office (OCSO) for the murder of Kinel. As part of its investigation, OCSO executed a search warrant of a residence where Hairston resided and found Hairston to be in possession of the gun box belonging to the SCCY, Model: CPX-2, which was recently purchased by SIMPSON.

8. Law Enforcement personnel reviewed video surveillance of SIMPSON making the July 3, 2019 purchase of the firearm from Bass Pro Outdoor World. Surveillance of the video showed SIMPSON and a subject, identified as Jevon Hairston, with her while she conducted the purchase.

9. On August 14, 2019, S/A Henry and OCSO Detective Adam Miller interviewed Jessica SIMPSON at OCSO Sheriff Headquarters, located at 1201 N. Telegraph, Building 38 East, Pontiac, Michigan. SIMPSON received and waived her Miranda rights before answering any questions. During the interview, SIMPSON advised on July 3, 2019, Hairston wanted to go the mall. SIMPSON and Hairston proceeded to the mall and they parked in the lot next to Bass Pro Outdoor World -- in Auburn Hills, Michigan -- as they normally do. While in the parking lot, Hairston proceeded to give SIMPSON approximately \$200 - \$300 and instructed her to purchase him a firearm. Both Hairston and SIMPSON proceeded

into Bass Pro Outdoor World and Hairston proceeded to pick out the firearm he wanted SIMPSON to purchase for him. SIMPSON admitted that she knew Jevon Hairston was a felon and that he could not buy the gun himself. SIMPSON purchased the SCCY, Model: CPX-2, Serial: 658930, 9mm pistol. Upon completion of the purchase, both subjects proceeded out of the store and to the vehicle. Hairston took possession of the firearm after he and SIMPSON exited Bass Pro Outdoor World. SIMPSON said she has not seen the firearm since it was purchased. SIMPSON did not register the firearm nor report the firearm stolen because she purchased the pistol for Hairston.

10. ATF Group Special Agent and Interstate Nexus Expert David Salazar determined that the SCCY Model: CPX-2, Serial# 658930, 9mm pistol, purchased by SIMPSON is a “firearm” as defined under Chapter 44, Section 921, and was manufactured outside the State of Michigan after 1898, therefore, traveling in and affecting interstate commerce.

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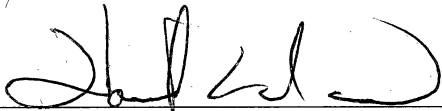
11. Based on the above stated facts, I have probable cause to believe that Jessica SIMPSON did make false statements to a firearm dealer, in violation of Title 18, United States Code, Section 922(a)(6).

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Justin Henry", written over a horizontal line.

Justin Henry, Special Agent  
Bureau of Alcohol, Tobacco,  
Firearms, and Explosives

Sworn to before me and signed in my presence.

A handwritten signature in black ink, appearing to read "David R. Grand", written over a horizontal line.

HONORABLE DAVID R. GRAND  
UNITED STATES MAGISTRATE JUDGE

Date: 9/12/19